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LAW OFFICES  
**Zukowski, Rogers, Flood & McArdle**  
 50 VIRGINIA STREET  
 Crystal Lake, Illinois 60014  
 (815) 459-2050  
 fax (815) 459-9057

7160.003

June 7, 2019

Karen Lukasik  
 Algonquin Township Clerk  
 3702 U.S. Highway 14  
 Crystal Lake, IL 60014  
 VIA E-MAIL

Billed Through: 05/31/2019  
 Client Number: 009722 DWM  
 Invoice Number: 137583

Matter 00001 Attorney/Client Privilege Applies:

05/01/2019	conference with client re strategy and issues relating to answer to complaint; forward copy of complaint; follow up discussion; need addresses for deponents;	1.00 hrs
05/01/2019	receipt and review of Fourth Amended Complaint;	0.75 hrs
05/02/2019	receipt and review of draft responses to complaint from client; work on answer to complaint; conference with client; interoffice conference re strategy;	2.00 hrs
05/02/2019	edit Answer to Complaint; research re necessary party;	1.00 hrs
05/03/2019	continue work on answer to complaint; conference with client; review file materials; follow up re client comments;	2.00 hrs
05/05/2019	follow up re address of deponents;	0.25 hrs
05/06/2019	edit answer to 4th amended complaint; interoffice conference re settlement issues; receipt and review of motion filed by Miller;	1.50 hrs
05/07/2019	conference with client re strategy; conference with Attorney Kelly;	0.50 hrs
05/07/2019	telephone call from Attorney Kelly re possible mediation;	0.25 hrs
05/08/2019	conferences with Attorney Kelly re settlement, re 4th amended complaint and possible dismissal of parties; follow up conference with client;	1.25 hrs
05/09/2019	follow up conference with client re FOIA and video tape issues; discuss issues re depositions; correspondence and follow up re video removal off of Youtube; correspondence with Attorney Kelly; conference with client re return of Township records from State's Attorney's office;	1.50 hrs
05/10/2019	receipt and review of answer filed by Miller; review file and complaint re same; conference with client re outline of deposition issues; organize same;	1.50 hrs
05/13/2019	follow up with client re videos;	0.25 hrs
05/15/2019	correspondence and conference with client re closed session discussion and strategy; draft notice of deposition; discuss with client; draft notes for deposition; conference re settlement discussions;	1.50 hrs
05/16/2019	continue drafting notes for deposition;	1.00 hrs
05/17/2019	correspondence with State's Attorney re return of records; follow up with	1.50 hrs

	client; correspondence with attorney for Gasser re deposition; correspondence with Attorney Kelly; conference with client re Lutzow deposition notice; outline same;	
05/20/2019	correspondence with client re court order entered; follow up re discovery;	0.25 hrs
05/20/2019	court appearance to set Pre-Trial Conference;	0.50 hrs
05/21/2019	conference with client re co-defendant separate attorney; correspondence re deposition of C. Lutzow; correspondence with attorney for Miller;	0.50 hrs
05/22/2019	conference with client re preparation for deposition; follow up re same; interoffice conference re deposition date issues; conference with client re new law re Township Clerk; research same; correspondence with Attorney Hanlon re rescheduling deposition; correspondence with Attorney Prossnitz; correspondence with all parties re alternative new dates; follow up with client;	2.25 hrs
05/23/2019	correspondence with attorney for Supervisor re alternative deposition dates; follow up with client; correspondence with Attorney Hanlon; correspondence with Attorney Gooch;	0.50 hrs
05/28/2019	correspondence with Attorney Gooch re court appearance; follow up with client; correspondence re audio recordings issue; correspondence re missing records; follow up with Attorney Kelly; correspondence re detective cameras in records room;	0.75 hrs
05/29/2019	prepare for and attend court settlement conference; several conferences with client before and after court; interoffice conference; research re issues discussed in chambers; conference with client re deposition notices from Gasser; correspondence with State's Attorney; follow up conference with client; receipt and review of full written discovery issued by Supervisor; forward to and discuss with client; review pleadings; correspondence from Attorney Hanlon re discovery; conference with client re deposition notices for relatives;	5.00 hrs
05/30/2019	draft settlement demand; conference with client re settlement terms and strategy; follow up; review file re counterclaim; interoffice conference re same; forward final demand to Attorney Kelly;	2.25 hrs
05/31/2019	prepare for and attend continued settlement conference; several conferences with client re same and strategy; review pleadings; discuss statute of limitation; research re same; conference call with client re leak of settlement offer; discuss strategy;	4.00 hrs
<b>Total Fees For This Matter</b>	<b>33.75 hrs</b>	<b>\$8,437.50</b>

**BILLING SUMMARY**

<b>TOTAL FEES</b>	<b>33.75 hrs</b>	<b>\$8,437.50</b>
<b>TOTAL FOR THIS INVOICE</b>		<b>\$8,437.50</b>
<b>TOTAL BALANCE NOW DUE</b>		<b>\$8,437.50</b>

UNPAID BALANCES ARE SUBJECT TO A 1.5% PER MONTH DELINQUENCY CHARGE AFTER 30 DAYS FROM BILLING DATE.  
VISA AND MASTERCARD ACCEPTED.

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50 VIRGINIA STREET  
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fax (815) 459-9057

July 3, 2019

Karen Lukasik  
Algonquin Township Clerk  
3702 U.S. Highway 14  
Crystal Lake, IL 60014  
VIA E-MAIL

7160.003

Billed Through: 06/30/2019  
Client Number: 009722 DWM  
Invoice Number: 138054

Matter 00001

Attorney/Client Privilege Applies:

06/03/2019	receipt and review of Attorney Hanlon correspondence re discovery and settlement; receipt and review of motion for judgment on the pleadings filed by Gasser; review file; review rules; interoffice conference re same; correspondence from attorneys for Miller and Lutzow; receipt and review of correspondence from attorney for A. Miller; additional correspondence with Attorney Kelly;	1.25 hrs
06/04/2019	interoffice conference re motion for judgment on the pleadings; research amended counterclaim re security of records, FOB system and access; receipt and review of draft letter from client to Attorney Kelly; follow up with client; receipt and review of correspondence between Attorneys Gooch and Hanlon re settlement; follow up conference with client;	1.50 hrs
06/05/2019	conference with client re discovery strategy; discuss failed deposition of Lutzow;	0.50 hrs
06/06/2019	conference with client and review correspondence re records and timecards; correspondence with county; correspondence re health of C. Lutzow; correspondence with Attorney Hanlon re deposition; follow up with client;	1.00 hrs
06/07/2019	conference call with Attorney Kelly and client re settlement documents; follow up with client re counterclaim amendment re security of Township records; correspondence to Attorney Gooch re supervision of discovery; receipt and review of Attorney Hanlon's response; conference with client;	1.50 hrs
06/08/2019	work on amended counterclaim re security of records; follow up with client;	1.25 hrs
06/09/2019	correspondence and follow up with client re settlement issues; discuss amended counterclaim;	0.50 hrs
06/11/2019	receipt and review of Miller's motion to reset pretrial and schedule 218 conference; correspondence and conference with client; review files;	1.25 hrs
06/13/2019	conference with Attorney Kelly re FOIA, settlement proposal; follow up with client;	0.50 hrs
06/14/2019	prepare for and attend court appearance; receipt and review of correspondence from Attorney Hanlon re 201(k); review rules; review case law; follow up with	1.75 hrs

	client;	
06/17/2019	conference with client re notice of deposition requested by attorney for Gasser; follow up with attorney for Gasser; correspondence with attorney for Lutzow re note form spouse; follow up re cancelling deposition; follow up with client;	0.50 hrs
06/18/2019	receipt and review of correspondence re health of C. Lutzow; follow up with client;	0.25 hrs
06/18/2019	call from Mrs. Lutzow; follow up with Attorney Kelly re same; follow up with client;	0.25 hrs
06/18/2019	research re motions to strike/sanctions;	0.25 hrs
06/20/2019	conference and correspondence with Attorney Kelly re protective orders as they relate to FOIA for video tapes; follow up re same; request for assistance in response; review files for protective orders; conference with client re scheduled deposition by Attorney Hanlon; review file; discuss scheduled court appearance on June 21; correspondence with client re Township video; receipt and review of correspondence with County for return of Township property and files; correspondence with attorney for Gasser cancelling deposition of client; follow up with client;	2.50 hrs
06/21/2019	prepare for and attend court appearance re pretrial; follow up conference with client; receipt and review of motion for sanctions filed by Gasser; search towing files re pending lawsuit re FOIA breach; review pleadings;	3.50 hrs
06/22/2019	work on outline of response to motion for sanctions; research availability of records in possession of County State's Attorney; several conferences with client re same;	2.25 hrs
06/23/2019	conference with client re Township meeting re settlement of suit;	0.50 hrs
06/24/2019	conference with Attorney Kelly re motion for sanctions; review file; follow up with client;	0.75 hrs
06/26/2019	begin review of request to admit; interoffice conference re strategy; review rules and comments re same; work on outline; interoffice conference re same;	1.25 hrs
06/26/2019	research 216 objection; interoffice conference re same;	0.75 hrs
06/28/2019	research objections to Request to Admit, sanctions based on allegation, sanctions based on information and belief re Gasser; interoffice conference re same;	0.75 hrs

Total Fees For This Matter

24.50 hrs

\$6,125.00

**BILLING SUMMARY**

TOTAL FEES	24.50 hrs	\$6,125.00
TOTAL FOR THIS INVOICE		\$6,125.00
NET BALANCE FORWARD		\$8,437.50
TOTAL BALANCE NOW DUE		\$14,562.50

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VISA AND MASTERCARD ACCEPTED.

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50 VIRGINIA STREET  
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fax (815) 459-9057

August 8, 2019

Karen Lukasik  
Algonquin Township Clerk  
3702 U.S. Highway 14  
Crystal Lake, IL 60014  
VIA E-MAIL

Billed Through: 07/31/2019  
Client Number: 009722 DWM  
Invoice Number: 138532

Matter 00001

Attorney/Client Privilege Applies:

07/01/2019	correspondence and follow up with client re Gasser motion files; interoffice conference re same; coordinate meeting with client;	0.50 hrs
07/01/2019	drafting of Answer to Request to Admit and Motion for Hearing on Objection;	1.00 hrs
07/02/2019	receipt and review audit request; draft response to same;	0.25 hrs
07/02/2019	conference with client re meeting to discuss counterclaim amendment and response to pending motions; receipt and review of audit request; draft response to same;	0.50 hrs
07/03/2019	edit audit letter;	0.25 hrs
07/03/2019	research in preparation to respond to Motion re Gasser;	0.50 hrs
07/05/2019	work with client re responses to allegations; conference re Nelson correspondence; receipt and review of correspondence with County State's Attorney re records return; conference with Attorney Kelly re correspondence; meeting with client;	1.25 hrs
07/05/2019	meeting with client re response to motion and request to admit; interoffice conference re strategy; review file; research rules;	2.00 hrs
07/05/2019	conference with client in preparation to draft Motion to Dismiss; finalize Answer to Request to Admit;	2.50 hrs
07/08/2019	conference with client re intended correspondence with County; receipt and review correspondence between attorneys for Township and Bob Miller; work on draft response to Gasser motion; interoffice conference re same;	1.25 hrs
07/08/2019	receipt and review of Attorney Nelson's proposed order; follow up with client; conference with Attorney Kelly re same; review file correspondence re position of parties;	1.00 hrs
07/08/2019	drafting of Completion of Motion to Dismiss Petition; research;	1.75 hrs
07/09/2019	continue work on Response Brief; correspondence with attorney for A. Miller;	1.00 hrs
07/09/2019	correspondence with attorney; review invoice; conference with client;	0.75 hrs
07/09/2019	correspondence with attorney for Gasser re motion - presentation; conference with client re same;	0.25 hrs

07/09/2019	work on response to motion; interoffice conference re same; review file; work on objection relating to request to admit;	1.25 hrs
07/09/2019	edit Motion for Ruling on Objection to Request to Admit;	0.25 hrs
07/09/2019	receipt and review of motion, filed counterclaim; analyze Response;	0.50 hrs
07/10/2019	correspondence with all counsel re settlement position; coordinate with client; correspondence with Attorney Kelly re same;	0.75 hrs
07/10/2019	interoffice conference re court; conference with client re same, and pending pleadings; follow up conference with Attorney Kelly; send July 10 order to counsel; work on response and objection to request to admit; review motion for judgment on the pleadings; work on amended counterclaim; interoffice conference re strategy;	2.50 hrs
07/10/2019	court appearance in front of Judge Meyer;	1.00 hrs
07/10/2019	review motion filed;	1.00 hrs
07/10/2019	interoffice conference re motion;	0.50 hrs
07/10/2019	telephone call to Assistant State's Attorney re request and documents previously released; draft letter to McHenry County State's Attorney's Office requesting reports pursuant to FOIA re Case No. 17 CH 435;	1.00 hrs
07/11/2019	receipt and review correspondence from Attorney Hanlon to Attorney Nelson; receipt and review of Attorney Gooch response; correspondence with client re position; interoffice conference re Attorney Hanlon with regard to exhibits to motion; work on Amended Counter-claim/Third-party Complaint;	1.50 hrs
07/11/2019	conference with client re securing records with bolt lock; discuss response to request to admit issued by Gasser; interoffice conference re same;	0.75 hrs
07/11/2019	drafting of Amended Counter Complaint;	1.50 hrs
07/11/2019	research re motion;	1.75 hrs
07/11/2019	review counterclaim;	0.50 hrs
07/11/2019	review Complaint and 4th Amended Complaint;	0.50 hrs
07/11/2019	interoffice conference re pending motion;	0.25 hrs
07/11/2019	review FOIA documents;	0.25 hrs
07/11/2019	draft motion;	1.25 hrs
07/11/2019	receipt and review of response to FOIA for investigative reports re 17 CH 435;	0.50 hrs
07/13/2019	coordinate signed documents with client;	0.25 hrs
07/13/2019	work on response to motion; draft revised response; interoffice conference re strategy; review pleadings;	2.00 hrs
07/15/2019	work on responsive pleading; interoffice conference re strategy; work on objection to request to admit;	0.75 hrs
07/15/2019	edit objection for request for admission of facts; interoffice conference re same;	1.25 hrs
07/15/2019	draft motion, response, exhibits;	3.00 hrs
07/15/2019	review draft to amended complaint;	0.75 hrs
07/15/2019	interoffice conference re response and amended complaint;	1.00 hrs
07/15/2019	revisions to Amended Complaint;	1.00 hrs
07/15/2019	revisions to objection to 216 request;	1.25 hrs
07/16/2019	review check received from Township; review invoice; follow up with Attorney Kelly; conference with client;	0.75 hrs
07/16/2019	correspondence with Attorney Hanlon re pleadings; receipt and review motion filed by Basser; receipt and review Miller's response to request to admit;	1.00 hrs

	receipt and review emergency motion from Attorney Hanlon;	
07/16/2019	receipt and review of response to motion and cross motion;	0.25 hrs
07/16/2019	revisions to objection to 216 request and exhibits;	0.50 hrs
07/16/2019	interoffice conference re motion;	0.25 hrs
07/17/2019	receipt and review Gasser reply brief; review pleadings;	0.75 hrs
07/17/2019	prepare for and attend court appearance on emergency motion; interoffice conference re strategy; follow up with client; interoffice conference re court appearance an argument on July 19, 2019;	1.50 hrs
07/17/2019	telephone call from Attorney Gooch re hearing, pleadings, RTA, status and answer;	0.25 hrs
07/17/2019	draft amended complaint;	1.00 hrs
07/17/2019	interoffice conference re reply to motion;	0.25 hrs
07/17/2019	review of reply - motion;	0.25 hrs
07/18/2019	correspondence with Attorney Kelly re request to admit; receipt and review pleadings from attorney for Bob Miller; interoffice conference re court strategy;	1.00 hrs
07/18/2019	meeting with client re court hearing; discuss strategy; interoffice conference re outline of arguments; review file; prepare for argument;	2.25 hrs
07/18/2019	interoffice conference re strategy re 7/19 argument; meeting with client;	2.00 hrs
07/18/2019	meeting with client;	0.50 hrs
07/18/2019	conference re Attorney Hanlon correspondence, phone conference, analysis;	1.25 hrs
07/18/2019	research re Hanlon correspondence;	1.25 hrs
07/18/2019	prepare overview for hearing on motion;	1.50 hrs
07/19/2019	preparation for and attendance at court on pending motions, conduct hearing;	3.00 hrs
07/19/2019	continue working on outline of argument against Gasser motion/position; forward same to client; interoffice conference re strategy/argument; work on amended pleading; interoffice conference re same;	2.00 hrs
07/19/2019	correspondence and research re records, pleadings;	0.25 hrs
07/19/2019	interoffice conference re pleadings, hearing, strategy;	0.75 hrs
07/19/2019	research Declaratory Complaint, elements, injunctive relief, amended complaint;	0.75 hrs
07/19/2019	draft amended complaint-declaratory and injunctive relief; correspondence re changes;	2.25 hrs
07/22/2019	conference with client re court appearance; discuss strategy; work on draft amended counterclaims; meeting with Attorney Kelly;	1.50 hrs
07/22/2019	research response to petition;	1.50 hrs
07/22/2019	draft response;	2.75 hrs
07/22/2019	conference and research re judgment of the pleadings, amended complaint;	1.50 hrs
07/22/2019	interoffice conference; research procedure and discuss implications;	0.75 hrs
07/23/2019	finalize motion for leave to file amended pleadings; correspondence with client re same; receipt and review settlement proposal from Attorney Kelly;	0.75 hrs
07/23/2019	receipt and review correspondence between Hanlon/Nelson; conference with client re correspondence from attorney for Lutzow; correspondence re records person with state archives; review files for contact information; work on amended pleadings; forward to client for review;	1.25 hrs
07/23/2019	draft response, revisions, conferences with attorneys; research re rules;	4.25 hrs
07/23/2019	review Motion to Leave to Amend;	0.25 hrs

07/24/2019	conference with client; conference re amended pleading; work on same;	1.50 hrs
07/24/2019	work on response to Complaint;	2.00 hrs
07/24/2019	revisions to response, research, exhibits;	4.25 hrs
07/25/2019	review response filed by Gasser re leave to file amended pleading; research cases cited; interoffice conference re strategy; conference with attorney Kelly re settlement position;	1.75 hrs
07/25/2019	correspondence from attorney for Gasser re amended pleading; interoffice conference re same;	0.25 hrs
07/25/2019	finalize draft response to complaint; forward to client;	0.75 hrs
07/25/2019	receipt and review Gasser response to client motion to file amended pleading; receipt and review Gooch correspondence to attorney for Township re Attorney Hanlon's position; correspondence to Attorney Kelly re response to position;	1.00 hrs
07/25/2019	revisions, additional exhibits;	1.25 hrs
07/26/2019	continue review of cases cited in Gasser response to motion for leave to amend; prepare for and attend court for argument; follow up conference with client; interoffice conference re amended pleading; review motion for judgment on pleadings; review law re procedural issues;	3.25 hrs
07/26/2019	receipt and review answer of A. Miller to Fourth Amended Complaint; receipt and review documentation from client re support of Amended Pleading;	1.00 hrs
07/26/2019	interoffice conference re court ruling, amended complaint;	0.50 hrs
07/27/2019	review correspondence and back up from client re records not within her possession; work on amended pleading; conference with client re strategy;	2.75 hrs
07/29/2019	review original third-party complaint and count II filed in case; review drafts of amended pleading; interoffice conference re strategy; work on amended pleading; review file; review documentation received from client supporting amended claim;	4.00 hrs
07/29/2019	follow up with client re back up for amended pleading; work on same;	2.25 hrs
07/29/2019	revise Amended Complaint;	0.25 hrs
07/30/2019	conference with client re allegations in proposed amended pleading; work on same;	1.75 hrs
07/30/2019	conference with client re proposed amended pleading;	0.50 hrs
07/30/2019	revise amended pleading; follow up with client; research issues; review files;	2.00 hrs
07/31/2019	several conferences with client re court appearance - amend pleadings; other pending issues; prepare for court;	1.00 hrs
07/31/2019	finalize/file amended pleading;	1.25 hrs
07/31/2019	revisions to Amended Complaint;	0.75 hrs
Total Fees For This Matter		117.50 hrs
		\$29,375.00

**BILLING SUMMARY**

TOTAL FEES	117.50 hrs	\$29,375.00
DELINQUENCY CHARGES THIS MONTH ON PREVIOUS BALANCE		\$23.44
TOTAL FOR THIS INVOICE		<u>\$29,398.44</u>

Lukasik, Karen

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NET BALANCE FORWARD

\$1,562.50

TOTAL BALANCE NOW DUE

\$30,960.94

UNPAID BALANCES ARE SUBJECT TO A 1.5% PER MONTH DELINQUENCY CHARGE AFTER 30 DAYS FROM BILLING DATE.  
VISA AND MASTERCARD ACCEPTED.